


SEALED

FILED

JUL 29 2020

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY  DEPUTY CLERK

UNITED STATES OF AMERICA,

Plaintiff,

VS.

CRYSTAL ANTOINETTE WOODS (1),
NINA RODRIGUEZ (2)

Defendants.

§ CRIMINAL NO.:

SA 20 CR 0346 OG

§ COUNTS 1-2: 18 U.S.C. §§1791(a)(1)
& (b)(1); Providing Contraband in Prison

§ COUNT 3: 21 USC §§ 846, 841(a)(1)
& 841(b)(1)(A); Conspiracy to Distribute a
§ Controlled Substance

THE GRAND JURY CHARGES:

COUNT ONE

[18 U.S.C. §§1791(a)(1) & (b)(1)]

That on or about January 24, 2019, in the Western District of Texas, Defendant,

CRYSTAL ANTOINETTE WOODS (1)

contrary to Title 21, United States Code, Section 841, provided and attempted to provide a prohibited object, to wit: suboxone, to an inmate in the Central Texas Detention Facility-GEO, a prison, institution, and facility in which persons are held in custody by direction of and pursuant to a contract and agreement with the Attorney General, or attempted to do so, in violation of Title 18, United States Code, Sections 1791(a)(1) and (b)(1).

COUNT TWO

[18 U.S.C. §§1791(a)(1) & (b)(1)]

That on or about June 19, 2019, in the Western District of Texas, Defendant,

NINA RODRIGUEZ (2)

contrary to Title 21, United States Code, Section 841, provided and attempted to provide a prohibited object, to wit: suboxone, to an inmate in the Central Texas Detention Facility-GEO, a prison, institution, and facility in which persons are held in custody by direction of and pursuant

to a contract and agreement with the Attorney General, or attempted to do so, in violation of Title 18, United States Code, Sections 1791(a)(1) and (b)(1).

COUNT THREE
[21 USC §§ 846, 841(a)(1) & 841(b)(1)(A)]

That beginning on or about January 1, 2015, the exact date unknown, and continuing until on or about the date of this indictment, in the Western District of Texas, Defendants,

CRYSTAL ANTOINETTE WOODS (1)
NINA RODRIGUEZ (2)

unlawfully, knowingly, and intentionally combined, conspired, confederated and agreed together and with others known and unknown to the Grand Jury to distribute and to possess with intent to distribute controlled substances, which offense involved 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance and 1 kilogram or more of a mixture or substance containing a detectable amount of heroin, a Schedule I Controlled Substance, contrary to Title 21, United States Code, Sections 841(a)(1) & 841(b)(1)(A) and in violation of Title 21, United States Code, Section 846.

A TRUE BILL



FOREPERSON OF THE GRAND JURY

JOHN F. BASH
UNITED STATES ATTORNEY

BY: 
RUSSELL D. LEACHMAN
Assistant United States Attorney